

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

FLEXIWORLD TECHNOLOGIES, INC.,

Plaintiff,

v.

ROKU, INC.

Defendant.

Civil Action No. 6:20-cv-00819-ADA

JURY TRIAL DEMANDED

**JOINT REPORT REGARDING NARROWING ASSERTED
CLAIMS AND PRIOR ART REFERENCES**

In accordance with the Court’s Scheduling Order (Dkt. 23) entered in this action, Plaintiff Flexiworld Technologies, Inc. (“Flexiworld”) and Defendant Roku, Inc. (“Roku”) (collectively the “Parties”) met and conferred on February 10, 2022, to discuss narrowing the number of asserted claims and prior art references at issue. The result of the Parties’ meet and confer on these subjects is set forth below.

Flexiworld has reduced the number of asserted claims to nine across the three patents-in-suit. Roku disputes that nine is the number of claims actually left in the case.

Roku is maintaining its assertion of four prior art systems. Flexiworld disputes that four prior art references is the number of references actually left in the case.

The Parties will continue to explore the further narrowing the number of asserted claims and prior art references as this action moves closer to trial.

Dated: February 17, 2022

/s/ Timothy E. Grochocinski
TIMOTHY E. GROCHOCINSKI
ILLINOIS BAR NO. . 6295055
AUSTIN GINNINGS
NY BAR No. 4986691
NELSON BUMGARDNER CONROY PC
15020 S. Ravinia Avenue, Suite 29
Orland Park, Illinois 60462
708.675.1975 (telephone)
tim@nelbum.com
austin@nelbum.com

PATRICK J. CONROY
STATE BAR NO. 24012448
RYAN P. GRIFFIN
STATE BAR NO. 24053687
NELSON BUMGARDNER CONROY PC
2727 N. Harwood, Suite 250
Dallas, Texas 76107
214.446.4950 (telephone)
pat@nelbum.com
ryan@nelbum.com

Counsel for Plaintiff
Flexiworld Technologies, Inc.

Respectfully submitted,

/s/ Matthew C. Bernstein
MATTHEW C. BERNSTEIN
California Bar No. 199240
PERKINS COIE LLP
11452 El Camino Real, Suite 300
San Diego, California 92130-2080
858.720.5700 (telephone)
mbernstein@perkinscoie.com

MARTIN E. GILMORE
PERKINS COIE LLP
500 West 2nd Street, Suite 1900
Austin, Texas 78701
737.256.6100 (telephone)
mgilmore@perkinscoie.com

Attorneys for Defendants
Roku, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 17, 2022, the foregoing document was electronically filed with the Clerk of Court using the CM/ECF filing system, which will generate and send an e-mail notification of said filing to all counsel of record.

/s/ Timothy E. Grochocinski